



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
ATLANTA FEDERAL CENTER  
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ATLANTA, GEORGIA 30303-8960

April 25, 2008

Mr. Donald Silawsky  
Office of Petroleum Reserves (FE-47)  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585-0301

SUBJ: Scoping Comments for  
Supplemental Environmental Impact Statement (SEIS)  
Strategic Petroleum Reserve in Richton, Mississippi

Dear Mr. Silawsky:

EPA Region 4 appreciates your continued coordination with us regarding the Strategic Petroleum Reserve project. The U.S. Environmental Protection Agency (EPA), pursuant to Section 102(2)(C) of the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act, reviewed your letter and maps dated March 21, 2008. The purpose of this letter is to respond to your request regarding concerns to be addressed in your upcoming SEIS.

Due to the new infrastructure that will be required at the Richton site, EPA has concerns regarding several aspects of the project. Water withdrawals and brine disposal are among the areas which should be fully evaluated and described in the SEIS.

Secondary and cumulative effects, expansion of the underwater pipeline corridor within the Pascagoula River, and impacts of water intakes should also be discussed in the SEIS. The document should describe all anticipated environmental impacts, both direct and cumulative.

The SEIS should also provide information regarding petroleum transfer and delivery to the facility, and preparation of the salt domes for petroleum storage. The proposed plans for the salt dome(s) should also receive a complete environmental evaluation.

Alternatives

Concerns exist regarding the quantity of surface water withdrawals and impacts of surface water discharges. The SEIS should evaluate potential sources of water for the project, including surface water, groundwater, and other possible sources.

Various environmental permits for this project will be required, and the permitting processes need to be given early consideration.

Impacts should be avoided/minimized to the maximum extent feasible. We appreciate that the potential pipeline locations would follow existing corridors. Placement of diffusers and pipelines need to avoid/minimize impacts to critical habitats and wetlands. The SEIS should adequately describe mitigation plans for any unavoidable impacts.

#### NPDES Discharges

The SEIS should fully describe anticipated NPDES discharges. DOE will need to coordinate NPDES Permitting activities with MSDEQ.

#### Air Quality

The SEIS should fully describe anticipated air emissions, measures to avoid/mitigate impacts, and compliance with air quality regulations.

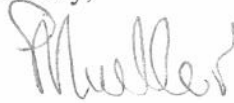
#### Impacts and Mitigation

In addition, the following potential impacts and their mitigation should be evaluated and discussed in the SEIS:

- Habitat (temporary and permanent) displacement;
- Waters of the United States compensatory mitigation;
- River hydrologic modifications caused by the proposed pipeline;
- Mississippi Sound water quantity and quality;
- Pascagoula River water quantity and quality;
- Threatened and Endangered Species and Critical Habitat impacts;
- Sea level rise, greenhouse gases and climate change impacts;
- Sediment drift near the shoreline (from the effluent and from pipeline construction and maintenance);
- State Designated Uses including recreational direct and indirect contact, recreational and commercial fisheries, and shellfish harvesting;
- Hurricane influences on the facility and pipelines;
- Hurricane influences on effluent in the Mississippi Sound and Pascagoula River;
- Spill emergency action plans;
- Spill frequencies and volume based on similar activities in other areas;
- Diffuser design;
- Discharge quantity; and
- Discharge constituents and concentrations.

We appreciate the opportunity to provide these comments. If you have questions or need additional assistance please contact Ramona McConney (404/562-9615).

Sincerely,

A handwritten signature in dark ink, appearing to read "Mueller". The signature is written in a cursive style with a large, stylized "M" and a trailing flourish.

Heinz J. Mueller, Chief  
NEPA Program Office  
Office of Policy and Management